

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**UNITED STATES OF AMERICA**

**v.**

**Cr. No. H-15-0316**

**ABRAM AARON LAWHORN**

**UNOPPOSED MOTION FOR CONTINUANCE**

The Defendant, Abram Aaron Lawhorn, moves this Court for a 45-day continuance of the motions deadline, pretrial conference and trial, and respectfully shows as follows:

Mr. Lawhorn is charged in a three-count indictment of receipt of child pornography in violation of 18 U.S.C. § 2252A(a)(2)(B) and § 2252A(b)(1), distribution of child pornography in violation of 18 U.S.C. § 2252A(a)(2)(B) and 2252A(b)(1), and possession of child pornography in violation of 18 U.S.C. §§ 2252A(a)(5)(B) and 2252A(b)(2) . The pretrial motions deadline was May 20, 2016, the pretrial conference is set for June 13, 2016, and the jury trial is set for June 20, 2016.

Undersigned counsel has identified certain legal and factual issues that require further investigation. Undersigned counsel needs more time to complete her

investigation and analysis, and then to file pretrial motions, if necessary, and to prepare for trial, if necessary.

The defendant respectfully submits that the best interests of justice served by granting this motion for a continuance substantially outweigh the interests of the defendant and the community in a speedy trial, and that failure to grant the continuance would deprive defense counsel of sufficient time to prepare for trial.

The government is unopposed to this Motion for Continuance.

Respectfully submitted,

MARJORIE A. MEYERS  
Federal Public Defender  
Southern District of Texas No. 3233  
Texas State Bar No. 14003750

By /s/ Genesis E. Draper  
GENESIS E. DRAPER  
Assistant Federal Public Defender  
Southern District of Texas No. 1269203  
Texas State Bar No. 24052099  
440 Louisiana, Suite 1350  
Houston, TX 77002-1669  
Telephone: 713.718.4600  
Fax: 713.718.4610

**CERTIFICATE OF CONFERENCE**

I certify that I conferred with Assistant United States Attorney Sherri Lynn Zack, and determined that the United States is unopposed to this motion for continuance.

/s/ Genesis E. Draper \_\_\_\_\_  
GENESIS E. DRAPER

**CERTIFICATE OF SERVICE**

I certify that on June 6, 2016, a copy of the foregoing Unopposed Motion to Continue was served by Notification of Electronic Filing and was delivered by email to the office of Assistant United States Attorney Sherri Lynn Zack.

/s/ Genesis E. Draper \_\_\_\_\_  
GENESIS E. DRAPER